

United States District Court
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-00041-JL-01

MOTION TO MODIFY PRE-TRIAL RELEASE CONDITIONS

Now Comes the Defendant, Ian Freeman, by and through counsel, and requests that certain conditions of his pre-trial release be modified.

As grounds for and in support of this motion, it states as follows:

1. Ian Freeman awaits trial; anticipated to begin sometime in mid-2022.
2. He was released from custody on or about May 21, 20921. The Defendant has complied with all conditions set forth by the Court.
3. He requests that certain conditions be modified:
 - a. That his ankle monitor be removed; and
 - b. That he be granted the ability to have contact with Michael Hampton, Colleen Fordham, Mark Edgington, Chris Rietmann and Aria DiMezzo.
4. With regard to the ankle monitor, it is our understanding that Scott Davidson of U. S. Probation, would not object to the removal of the monitor. It is our understanding that Freeman has complied with all conditions and requests while on pre-trial release. He will continue to cooperate with probation in the future.
5. With regard to the named individuals in Paragraph #3 of this motion, none of them have requested that Freeman have no contact with them. For the most part they are business or Church affiliated. For example. Hampton is the IT guy for the Church, an important

position and one where Freeman and he must communicate. Mark Edgington has been working with Freeman for over a decade and is an intricate and essential part of the Free Talk Live Production.

6. Freeman also needs to discuss matters with Colleen Fordham and Chris Reitmann as Freeman us the property manager of the Church property which includes the Mighty Moose Mart. Fordham and Reitmann run the business.

7. No allegations of intimidation or witness tampering have been asserted by any individual that Freeman is restricted from contacting. In fact, all individuals would invite contact.

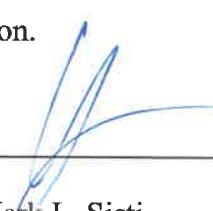
8. With regard to the no contact with "Nobody," Freeman would need to discuss certain business dealings with him concerning the development if a software application "Cell 411." Nobody is the lead developer and Freeman is the manager on behalf of the Church. They are working with software programmers located in India and coordinated communication is necessary.

9. Counsel's staff has contacted the United States Assistant Attorney, John F. Kennedy, Esq, and the Government objects to this motion.

September 9, 2021

Date

Signature


Mark L. Sisti

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CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Assistant United States Attorney John Kennedy, electronically through EFC on September 9, 2021.

September 9, 2021

Date

Signature

Mark L. Sisti

Print Name